

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MARLENE JOHANSEN

Plaintiff

Civil Action No. 04-11789-RCL

v.

UNITED STATES OF AMERICA

Defendant

PLAINTIFF'S MOTION TO CONTINUE SCHEDULING CONFERENCE

The Plaintiff, Marlene Johansen, moves this honorable Court to continue the scheduling conference scheduled for December 1, 2004 until January of 2005.

As reasons therefore Ms. Johansen states as follows:

1. That Ms. Johansen's counsel has been scheduled to attend a meeting in New York, New York on November 30, 2004 and on December 1, 2004.

2. That counsel for the Defendant has been informed of the scheduling conflict and has assented to counsel's request for a continuance.

For these reasons, Ms. Johansen prays this honorable Court to:

- a. Continue the scheduling conference until January, 2005.
- b. Any and all other remedies that this honorable court deems appropriate.

Marlene Johansen
by her attorney

/s/ Timothy Burke
Timothy J. Burke
400 Washington Street
Braintree, MA 02184
(781) 380-0770
BBO# 543837

Assented to:

The United States

/s/ Stephen Turanchik
Stephen Turanchik
Trial Attorney
Department of Justice
P.O. Box 55
Ben Franklin Station
Washington, D.C. 20044
(202) 307-6019

Plaintiff's Certificate of Compliance with Local Rule 7.1.

Plaintiff's counsel hereby certifies that his office telephoned counsel for the Defendant, Stephen Turanchik, on Monday, November 22, 2004. Counsel assented to the Plaintiff's motion.

Certificate of Service

I hereby certify that a true copy of the above document was served upon each attorney of record, via first class mail on November 22, 2004.

/s/Timothy Burke
Timothy Burke